

REMARKS/ARGUMENTS

The claims have been amended to focus on the tanning method described in the present application, where it has been shown that the particularly described clay mineral provides significant improved results with regard to selective filling, grain tightness, and overall leather quality. See, e.g., specification page 5, lines 20-30. No new matter has been entered.

Claim 32, directed to a method of tanning, is the main independent claim herein. Taylor and Rowland were not applied against Claim 32, presumably because they do not relate to tanning an animal hide. Rather, they relate to paper coatings. Both Lorah and Cramer were applied against Claim 32, and they will be distinguished below.

Lorah relates to emulsion polymerization methods involving lightly modified clay, and resultant compositions. These compositions are aqueous-based polymer dispersions which can include modified clays, and their disclosed uses include coatings such as "leather coatings." See, e.g., column 26, line 54 of the reference. However, and as recognized by the Examiner, Lorah does not teach a tanning agent nor the use of a disclosed composition in a tanning method:<sup>1</sup>

Lorah et al. do not teach all the instantly claimed embodiments in a single example and do not teach tanning agents.

Even though Lorah et al. do not teach a tanning agent uses of their compositions, the two different intended uses are not distinguishable in terms of the composition, see *In re Thuau*, 57 USPQ 324; *Ex parte Douros*, 163 USPQ 667; and *In re Craige*, 89 USPQ 393.

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<sup>1</sup> See pages 4 and 5 of the outstanding Official Action.

Moreover, the reference fails to teach the presently claimed tanning formulation comprising Applicants' particularly described claimed mineral and one or more substances selected from the group consisting of organic polymers, aldehyde tanning agents, etc. Thus, and because it has been recognized that the reference fails to disclose or suggest the claimed method for chrome-free and chrome tanning, Applicants respectfully request the reconsideration and withdrawal of the rejection over Lorah.

Cramer has similarly been recognized as not teaching tanning agents, and as not teaching a tanning agent use:<sup>2</sup>

Cramer et al. do not teach all the instantly claimed embodiments in a single example, do not teach tanning agents and are silent as to bimodal distributions.

Even though Cramer et al. do not teach a tanning agent uses of their compositions, the two different intended uses are not distinguishable in terms of the

composition, see *In re Thuau*, 57 USPQ 324; *Ex parte Douros*, 163 USPQ 667; and *In re Craige*, 89 USPQ 393.

For the same reasons presented above with regard to Lorah, the rejection over Cramer should be reconsidered and withdrawn.

Finally, the combination of Cramer in view of Lorah fails to disclose or suggest the presently claimed invention, as neither reference disclose or suggest a tanning agent or a method of tanning.

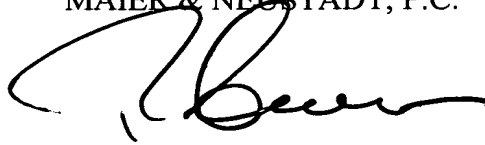
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<sup>2</sup> See pages 6 and 7 of the outstanding Official Action.

For these reasons Applicants respectfully submit that the present application is in condition for allowance, and early notification to this effect is respectfully requested.

Respectfully submitted,

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